



MARCH 23, 1992

FROM: KEVIN SCHANILEC, EPA REGION X

*KSchanilec*

TO: ALVIN HUMPHRIES, USDA FAX 510-559-5666

USEPA SF



1599710

AS DISCUSSED, HERE ARE EPA AND ECOLOGY'S REVIEW COMMENTS:

1. ON PAGE 5 OF THE CLOSURE REPORT, THE FINAL DIELDRIN LEVEL WAS SET AT 44 ppb, AND USES FR 7/20/90 AS THE REFERENCE. THE LEVEL LISTED IN THE FR, HOWEVER, IS 40 ppb. ONE OF THE FINAL SAMPLES MEASURED 42 ppb.

QUESTION: HOW DID THE DIELDRIN LIMIT GO FROM 40 TO 44? REFERENCE IS MADE TO "DETAILED CALCULATIONS" (IRIS?) FOR DIELDRIN LEVELS, AND SO YOU MAY HAVE THE DOCUMENTATION ON THIS. OUR FILES DON'T HAVE ANY DOCUMENTATION ON HOW 44 ppb WAS ARRIVED AT.

2. THERE ARE TWO HEXACHLOROCYCLOHEXANES IN SUBPART S: ONE HAS AN ACTION LEVEL OF 100 ppb, THE OTHER 4000. THE LIMIT ON PAGE 5 OF THE CLOSURE REPORT WAS SET AT 500. IT IS UNCLEAR HOW THE LIMIT OF 500 WAS ARRIVED AT, BUT, OF HIGHER CONCERN IS THAT IT WASN'T ANALYZED FOR DURING SOIL SAMPLING. IT IS NOT ON THE LIST OF "SOLVENTS OF INTEREST" USED AT THE SITE IN THE CLOSURE PLAN, AND SO IT IS UNCLEAR WHY IT WAS IN THE CLOSURE CRITERIA LIST.

QUESTION: WHY WAS THIS COMPOUND LISTED IN THE CLOSURE PLAN, AND HOW WAS THE CLEAN-UP LEVEL OF 500 ppb ARRIVED AT?

3. THE 1988 RFA REPORT DESCRIBES A SINK AND ASSOCIATED PIPING IN WHICH PESTICIDES WERE POURED, AND SO WERE IDENTIFIED AS PART OF THE DRAIN SYSTEM.

QUESTION: WERE THE SINK AND PIPING ADDRESSED (DECONTAMINATED, EXCAVATED, ETC.), AND IF SO, WERE VERIFICATION SAMPLES DONE?

4. SEVERAL BARRELS HOLDING DRILL CUTTINGS FROM THE DRAIN FIELD PROJECT WITH TRACES OF SOLVENTS (MEK, TCE, ACETONE, AND CYCLOHEXANE) WERE IDENTIFIED DURING THE MOST RECENT RCRA COMPLIANCE INSPECTION.

QUESTION: WHAT HAS BEEN DONE WITH THE BARRELS?

ASSUMING THESE FOUR AREAS CAN BE RESOLVED, IT APPEARS THAT THE CLOSURE CAN BE PUT OUT FOR THE REQUIRED 60 PUBLIC NOTICE PERIOD, AS REQUIRED BY 40 CFR 270.1.c.6. FINAL CLOSURE WOULD BE APPROVED BY BOTH EPA AND WASHINGTON DEPT OF ECOLOGY.

IN LIGHT OF THE ABOVE COMMENTS, IT IS EPA AND ECOLOGY'S OPINION THAT FRIDAY'S CONFERENCE MAY NOT BE NECESSARY. PLEASE GIVE ME A CALL AT 206-553-1061 AS SOON AS YOU HAVE HAD A CHANCE TO ADDRESS THE ABOVE AREAS OF CONCERN.